

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

**IN RE: AQUEOUS FILM-FORMING
FOAMS PRODUCTS LIABILITY
LITIGATION**

MDL No. 2:18-mn-2873-RMG

**This Document relates to
Campbell v. Tyco Fire Products LP et al.,
No. 2:19-cv-00422-RMG**

STIPULATION REGARDING TIMELINE FOR PROPOSED SETTLEMENT

WHEREAS, by order dated January 25, 2021 (“Preliminary Approval Order”), this Court granted preliminary approval of the proposed class action settlement between the Parties;

WHEREAS, the Court also adopted and approved the Parties’ Proposed Timeline (Dkt. No. 1087-4);

WHEREAS, the Parties now enter this Stipulation Regarding Timeline for Proposed Settlement to include several specific dates, including the Class Notice Deadline and the Fairness Hearing, as follows¹:

Date/Deadline	Event
January 25, 2021	Entry of Preliminary Approval Order.
February 8, 2021	Deadline for Class Counsel to begin Class Notice.
February 23, 2021	Deadline for Class Counsel to submit application for fees and expenses.
March 15, 2021	Deadline for any Class Member to object to Settlement.

¹ All capitalized terms below have the same meaning set forth in the Settlement Agreement that the Court has preliminarily approved.

March 15, 2021	Deadline for any Class Member to opt out from Settlement.
March 25, 2021	Class Counsel notifies Defendants and Court of all opt-outs and provides copies of notices of opt-out (“Opt Out Notice Package”).
7 days after Court ruling on individual Class Members’ objections to the Settlement	Deadline for those Class Member(s) who filed the at-issue objection(s) to opt out from Settlement.
14 days after Court ruling on any objections to the Settlement	Class Counsel notifies Defendants and Court with updated list of opt-outs and updated Opt Out Notice Package.
15 business days after Defendants receipt of initial and/or updated Opt Out Notice Package	Deadline for Defendants to terminate Settlement based on Section 3.5 of Agreement (opt-out percentages). ²
21 days prior to Fairness Hearing	Deadline for Class Counsel to file motion for approval of fees and expenses.
21 days prior to Fairness Hearing	Class Counsel files unopposed motion seeking Final Approval Order.
7 days prior to Fairness Hearing	Deadline for any objections to Class Counsel motion for approval of fees and expenses.
April 30, 2021	Fairness Hearing.
[TBD]	Final Approval Order entered. ³
[TBD]	Effective Date under Agreement.
10 days after deadline to appeal Final Approval Order (10 days after Effective Date)	Payment of fees and expenses awarded to Class Counsel, minus any common benefit holdback.

Dated: January 28, 2021

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² Defendants may also terminate the Settlement within fifteen (15) business days of a Defendant’s receipt of written notice of objection or required material modification from any federal or state authority.

³ If any appeal of the Final Approval Order is filed, all deadlines triggered after the date of the Final Approval Order shall resume fourteen (14) days after such appeal is decided.

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CERTIFICATE OF SERVICE

I hereby certify that on January 28, 2021, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing upon counsel of record.

Dated: January 28, 2021

_____/s/ Patrick J. Lanciotti_____